

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION, a Washington  
corporation,

Plaintiff,

v.

MOTOROLA, INC., and MOTOROLA  
MOBILITY LLC, and GENERAL  
INSTRUMENT CORPORATION,

Defendants.

MOTOROLA MOBILITY LLC, and  
GENERAL INSTRUMENT CORPORATION,

Plaintiffs/Counterclaim Defendant,

v.

MICROSOFT CORPORATION,

Defendant/Counterclaim Plaintiff.

CASE NO. C10-1823-JLR

DEFENDANTS' CONSOLIDATED  
REPLY TO DEFENDANT'S 10/4/12  
MOTIONS TO FILE DOCUMENTS  
UNDER SEAL

**NOTED ON MOTION CALENDAR:  
Friday, October 12, 2012**

DEFENDANTS' CONSOLIDATED REPLY TO  
DEFENDANT'S 10/4/12 MOTIONS TO FILE DOCUMENTS  
UNDER SEAL  
CASE NO. C10-1823-JLR

4845-5591-2465.1

SUMMIT LAW GROUP PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

**I. INTRODUCTION**

Because Motorola meets the standards for sealing as discussed in the moving briefs (Dkt. Nos. 455 and 460), and because Microsoft (*see* Dkt. No. 466) does not oppose Motorola's Motion to File Documents Under Seal in Support of Defendants' Motions in Limine (Dkt. No. 455) or Motorola's Motion to File Defendants' Proposed Findings of Fact and Conclusions of Law under Seal (Dkt. No. 460), and offers additional support why Motorola's Motions should be granted, Motorola respectfully requests that the Court grant the Motions, and seal Exhibits 1-4 and 7-12 to the Declaration of Stuart W. Yothers in Support of Defendants' Motions in Limine (Dkt. No. 459) and the unredacted versions of Motorola's Motions in Limine (Dkt. No. 458) and Proposed Findings of Fact and Conclusions of Law (Dkt. No. 462).

DATED this 12th day of October, 2012.

SUMMIT LAW GROUP PLLC

By /s/ Ralph H. Palumbo

Ralph H. Palumbo, WSBA #04751  
Philip S. McCune, WSBA #21081  
Lynn M. Engel, WSBA #21934  
*ralphp@summitlaw.com*  
*philm@summitlaw.com*  
*lynne@summitlaw.com*

By /s/ Thomas V. Miller

Thomas V. Miller  
MOTOROLA MOBILITY LLC  
600 North U.S. Highway 45  
Libertyville, IL 60048-1286  
(847) 523-2162

And by

Jesse J. Jenner (*pro hac vice*)  
Steven Pepe (*pro hac vice*)  
Kevin J. Post (*pro hac vice*)  
Ropes & Gray LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704  
(212) 596-9046  
*jesse.jenner@ropesgray.com*  
*steven.pepe@ropesgray.com*  
*kevin.post@ropesgray.com*

James R. Batchelder (*pro hac vice*)  
Norman H. Beamer (*pro hac vice*)  
Ropes & Gray LLP  
1900 University Avenue, 6<sup>th</sup> Floor  
East Palo Alto, CA 94303-2284  
(650) 617-4030  
*james.batchelder@ropesgray.com*  
*norman.beamer@ropesgray.com*

Paul M. Schoenhard (*pro hac vice*)  
Ropes & Gray LLP  
One Metro Center  
700 12<sup>th</sup> Street NW, Suite 900  
Washington, DC 20005-3948  
(202) 508-4693  
*paul.schoenhard.@ropesgray.com*

***Attorneys for Motorola Solutions, Inc., Motorola  
Mobility LLC and General Instrument Corp.***

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Arthur W. Harrigan, Jr., Esq.  
Christopher T. Wion, Esq.  
Shane P. Cramer, Esq.  
Calfo Harrigan Leyh & Eakes LLP  
*arthurh@calfoharrigan.com*  
*chrisw@calfoharrigan.com*  
*shanec@calfoharrigan.com*

Richard A. Cederroth, Esq.  
Brian R. Nester, Esq.  
David T. Pritikin, Esq.  
Douglas I. Lewis, Esq.  
John W. McBride, Esq.  
David Greenfield, Esq.  
William H. Baumgartner, Jr., Esq.  
David C. Giardina, Esq.  
Carter G. Phillips, Esq.  
Constantine L. Trela, Jr., Esq.  
Ellen S. Robbins, Esq.  
Nathaniel C. Love, Esq.  
Sidley Austin LLP  
*rcederroth@sidley.com*  
*bnester@sidley.com*  
*dpritikin@sidley.com*  
*dilewis@sidley.com*  
*jwmcbride@sidley.com*  
*david.greenfield@sidley.com*  
*wbaumgartner@sidley.com*  
*dgiardina@sidley.com*  
*cphillips@sidley.com*  
*ctrela@sidley.com*  
*erobbins@sidley.com*  
*nlove@sidley.com*

T. Andrew Culbert, Esq.  
David E. Killough, Esq.  
Microsoft Corp.  
*andycu@microsoft.com*  
*davkill@microsoft.com*

DATED this 12th day of October, 2012.

/s/ Marcia A. Ripley

Marcia A. Ripley